

Attorneys admitted in California, New York, Texas, Pennsylvania, Colorado, and Illinois

Sender's contact:  
djenkins@donigerlawfirm.com  
(310) 590-1820



Doniger / Burroughs Building  
603 Rose Avenue  
Venice, California 90291

Doniger / Burroughs NY  
247 Water Street, First Floor  
New York, New York 10038

October 18, 2024

**DELIVERED VIA ECF**

The Honorable Dale E. Ho  
Daniel Patrick Moynihan  
United States Courthouse  
500 Pearl Street  
New York, New York 10007-1312

**Case Title:** *Andy Ryan Photographer, LLC v. Westfair Communications, Inc.; et al.*  
**1:24-cv-05732-DEH**  
**Re:** **Request to Adjourn Initial Conference and Extend**

Your Honor:

This office represents Plaintiff, Andy Ryan Photographer, LLC, in the above referenced matter. We write jointly with Defendant Westfair Communications, Inc. to request that the initial conference in this matter be adjourned to November 22, 2024, and that Defendant's deadline to respond to Plaintiff's complaint be extended to November 15, 2024. The conference is currently scheduled for October 22, 2024.

There is good cause for this request. Counsel for Defendant first appeared in this matter on October 16, less than a week before the current date for the initial conference. And Plaintiff's counsel returned from a trial out of state only recently on October 17, 2024. The parties are now in communication and Defendant requests a extension of its deadline to respond to Plaintiff's Complaint to November 15 to allow the parties to engage in settlement discussion before a response is due. The parties accordingly seek to set the initial conference for a week after the new deadline for Defendant to respond for the same reasons.

In light of the foregoing, we respectfully request that the initial conference in this matter be adjourned until November 22, 2024, and that Defendant's deadline to respond to Plaintiff's complaint be extended to November 15. This is the second request to adjourn the initial conference and the first request to extend the deadline for Defendant's response. Both parties consent to both requests. We thank Your Honor for your attention to this matter.

Respectfully submitted,

By: */s/ David Michael Stuart Jenkins*  
 David Michael Stuart Jenkins, Esq.  
*Attorney for the Plaintiff*

**SO ORDERED.**

Date: \_\_\_\_\_, 2024  
 New York, New York

By: \_\_\_\_\_  
 Honorable Dale E. Ho  
 United States District Court Judge

Application GRANTED in part.

The initial conference scheduled for October 22, 2024 is ADJOURNED to November 19, 2024, 11:00 am ET. The parties shall join the conference by dialing (646) 453 - 4442 and entering the conference ID: 898 352 158, followed by the pound sign (#). In accordance with Paragraph 3.c of the Court's Individual Practices, the parties shall file on ECF a joint letter, described at ECF No. 9, and a proposed Civil Case Management Plan and Scheduling Order attached as an exhibit to the joint letter, no later than November 12, 2024.

The request to extend Defendant's deadline to respond to Plaintiff's Complaint is GRANTED. Defendant shall file a response by November 15, 2024.

The Clerk of Court is respectfully directed to close ECF No. 14.

SO ORDERED.



Dale E. Ho  
United States District Judge  
Dated: October 21, 2024  
New York, New York